
Program Letter

Bureau of Storage Tank Regulation
November 1997

Tightness Testing of Seasonal Use Tanks

The Department has been asked to revisit and clarify the policy regarding seasonally used USTs and USTs impacted by high groundwater or flooding. A policy established in August, 1990 required that seasonally used tanks be treated as such:

1. Prior to seasonal closure, the tank is to be emptied by removing all product that the dispenser will draw. If the tank is not emptied, the operator *must* conduct the respective monthly and annual leak detection monitoring during the period the tank is out-of-service.
Some conditions of high groundwater or frequent flooding may require the operator to maintain product in the tank to assist as a "hold down" mechanism so the tank will not float out of the ground.
2. The local fire department must be formally notified of the temporary out-of-service status.
3. The vent on the tank is to be left open.
4. The local fire department is to be notified prior to bringing the tank back into service.
5. When the tank is brought back into service it (1,000 gallon capacity or less) is to be filled and static tested in compliance with ILHR 10.61(2) manual tank gauging or ILHR 10.61(3) tightness testing.
Tanks 1,001 to 2,000 gallon capacity may use manual tank gauging in place of inventory control but must also perform an annual tightness testing to meet the leak detection requirements. Tanks greater than 2,000 gallons must use an approved method of leak detection other than manual tank gauging.

A question of "when the test(s) must be conducted" has been raised. The intent of the requirement is to assess the integrity of the tank at a point that will prevent or minimize contamination from leakage. The tank must be tested prior to dispensing product from the tank. This means that an operator may not place product in the tank after the out-of-service period, and dispense product prior to conducting any of the tank integrity tests. If the operator of a 1,001 to 2,000 gallon tank is using the manual tank gauging and tightness testing methodology, the tightness test must be conducted at the onset of the service period and prior to dispensing product from the tank. Any tank system *impacted by high ground water or flooding* must have a tightness test prior to placing the system back in operation.

Seasonal tanks should have the following management practices in place:

- Shut-off the electric power to the system.
- Make sure the fill caps are in good condition and secured in place.
- Make sure that the plungers in the spill buckets are sealed to prevent water from entering the tank.
- Trip the shear valve to prevent water from entering or product from escaping if high water, flooding or ice have the potential to impact the dispenser.
- Loosen a fitting above the check valve on safer-suction systems so that if the dispenser has the potential to be impacted by flooding, ice or high groundwater the valve will remain with the piping and not let water into the tank.